Q

BEFORE THE ARKANSAS SECURITIES COMMISSIONER CASE NO. S-19-0014 ORDER NO. S-19-0014-19-OR02

DAVID BUTLER	RESPONDENT	
DAVID DITTE ED	DECRONISEM	
IN THE MATTER OF.	F1	
IN THE MATTER OF:		
	2 <u>2</u>	-
	č 🕳	
	<u> </u>	
	S = S	0
	5	

ORDER

- 1. On February 14, 2019, the Arkansas Securities Commissioner ("Commissioner") entered an Order Granting Conditional Registration ("February 14th Order") thereby approving the registration application of David Butler ("Butler"), CRD # 5876965, to be registered as an investment adviser representative with EGP Wealth Management, LLC ("EGP"), CRD # 298338, an SEC registered investment adviser firm.
- 2. The February 14th Order attached a Heightened Supervision Plan for EGP to provide heightened supervision of Butler's activities for a period of one year from the date of the entry of the Order.
- 3. Both Butler and EGP now desire to amend the original Heightened Supervision Plan attached to the February 14th Order. For reasons made known to the Staff of the Arkansas Securities Department ("Staff"), the Staff recommends that the Commissioner adopt an amended Heightened Supervision Plan for Butler. Butler and EGP have proposed a new Heightened Supervision Plan to the Staff which will be implemented by EGP and will commence immediately upon entry of this Order. The revised Heightened Supervision Plan will end on February 14, 2020.
 - All other aspects and provisions of the February 14th Order shall remain in place. 4.

IT IS THEREFORE ORDERED that the attached Heightened Supervision Plan shall replace the plan attached to the February 14th Order and shall be carried out by all parties thereto in accordance with the terms of this Order; and that this Order will not affect or alter any other provisions of the February 14th Order.

provisions of the February 14th Order.	¥	
WITNESS MY HAND AND SEAL thi	is the <u>///</u> day of April, 2019.	
	B. Edmond Waters Arkansas Securities Commissioner	
I hereby agree to the entry of this Order; consent to all terms, conditions, and orders contained herein; and waive any right to appeal from this Order.		
David Butler, Respondent	$\frac{34/08/2019}{\text{Date}}$	
Approved as to Content and Form:		
Baxter D. Drennon, Counsel for Respondent	1/10/2019 Date	
J. Campbell McLaurin III Associate General Counsel Arkansas Securities Department	7 / 10/2019 Date	

HEIGHTENED SUPERVISION PLAN

Employee Name: David Butler CRD # 5876965

Designated Supervisor: John R. Green CRD # 6266333

David Butler's ("Butler") registration application to be an investment adviser representative for EGP Wealth Management, LLC ("EGP"), CRD # 298338, was approved by an Order entered by the Arkansas Securities Commissioner ("Commissioner") on February 14, 2019. The Order attached a heightened supervision plan which was to be effective for a period of twelve months from the date of the Order. In an agreement with the Staff of the Arkansas Securities Department, Butler and EGP have amended the previous heightened supervision plan attached to the Order. This amended Heightened Supervision Plan will be implemented and administered by EGP and will commence upon entry of an order by the Commissioner. This plan will replace the previous plan and expire on February 14, 2020. The plan is comprised of the following:

- 1. Butler shall comply with and abide by any conditions imposed in this agreement, all applicable securities laws, and all supervisory procedures of EGP;
- EGP shall maintain a compliance officer ("Designated Supervisor") to monitor Butler and directly supervise Butler's activities;
- 3. The Designated Supervisor shall review a minimum of five account transactions per month to determine that the customer authorized said transactions;
- 4. All direct business transactions with which Butler is associated shall be reviewed and signed by the Designated Supervisor;
- 5. All brokerage trades to be made by Butler shall be submitted to the Designated Supervisor for his/her initial and approval prior to executing the trade;
- 6. 100% of Butler's correspondences shall be reviewed and approved by the Designated Supervisor;
- 7. Butler shall immediately report to EGP any complaint, verbal or written, or any action filed against him by any party;
- 8. The Staff shall conduct a surprise branch audit visit within the heightened supervision period to ensure compliance;
- 9. Records documenting the above (comprehensive stipulations) shall be maintained and made available to the Staff upon request.

I understand and agree to comply with the above-described procedures and plan. I also understand that failure to comply may result in immediate termination of my employment and registration as an investment adviser representative.

David Butler

I understand and agree to accept the responsibility of performing the above-described supervision.

John R. Green